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THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

21CV306

IBRAHIM MUSTAFAA,)
)
Plaintiff,)
v.)
)
CITY OF CHICAGO - Department of Administrative)
Hearings, ILLINOIS DEPT. HEALTHCARE &)
FAMILY SERVICES (HFS) THERESA EAGLESON,)
Director, in her official capacity; JEFFREY GRIMYSER)
ALJ, in his individual capacity; SARAH SMITH – ALJ,)
in her individual capacity; RICHARD FALEN – ADMIN)
CO, in his individual capacity; ERIC WILLIAMS – CSS,)
in his individual capacity; ANGELA MASSEY-INTERN,)
in her individual capacity; MARGO WATSON – CSS,)
in her individual capacity,)
Defendants.)

Case No.

Jury Trial Demanded

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

1. This five-count civil rights claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States, arising under 42 U.S.C. §§ 1983, 1985, 1986.

2. The Court has jurisdiction over Plaintiff's claims brought pursuant to 42 U.S.C. §§ 1983, 1985, 1986, 28 U.S.C. §§ 1343 and 1367.

3. Pro Se Plaintiff's full name is IBRAHIM MUSTAFAA residing at 626 Price Ave. Durham North Carolina. 27701 complaints of ;

4. Defendant, CITY OF CHICAGO Bureau of Administrative Hearings and the City of CHICAGO, Department of ILLINOIS DEPT. OF HEALTHCARE & FAMILY SERVICES (HFS) and employees, IDPA Maximus Staff.

5. Defendant THERESA EAGLESON, at all relevant times giving rise to this complaint is now the Director of (HFS) with offices located at 69 W. Washington St. 4th Floor Chicago, Il. 60602, is being sued in her official capacity is substituted for former Director Felicia Norwood, by operation of law. 735ILCS 5/2-1008(d) (2018).

6. Defendant, JEFFEREY GRIMYSER, at the time of the incidents giving rise to this complaint, was a Department of Administrative Hearings, Administrative Law Judge (ALJ) with offices located at 69 W. Washington St. 4th Floor Chicago, Il. 60602. He is being sued in his individual capacity.

7. Defendant, SARAH SMITH, at the time of the incidents giving rise to this complaint, was a Department of Administrative Hearings, Administrative Law Judge (ALJ), with offices located at 69 W. Washington St. 4th Floor Chicago, Il. 60602. She is being sued in her individual capacity.

8. Defendant, RICHARD FALEN, at the time of the incidents giving rise to this complaint, was an (HFS) ADMIN CO, with offices located at P.O.BOX 19405 Springfield, Il. 62794. He is being sued in his individual capacity.

9. Defendant, ERIC WILLIAMS, at the time of the incidents giving rise to this complaint, was an (HFS) CSS with offices located at P.O.BOX 19405 Springfield, Il. 62794. He is being sued in his individual capacity.

10. Defendant, ANGELA MASSEY, at the time of the incidents giving rise to this complaint, was an (HFS)-INTERN with offices located at P.O.BOX 19405 Springfield, Il. 62794. She is being sued in his individual capacity.

11. Defendant, MARGO WATSON, at the time of the incidents giving rise to this complaint

was an (HFS) CSS with offices located at P.O.BOX 19405 Springfield, Il. 62794. She is being sued in her individual capacity.

12. Defendant(s) engaged in practices failing to follow to income guideline policies that violate Section 1622, 241 and 242 of Title 18 of the United States Code, the Illinois Civil Rights Act of 2003, Illinois Uniform Deceptive Trade Practices Act, the Fair Debt Collection Practices Act, and Consumer Fraud Act.

13. Plaintiff was issued a lien against his bank account in 2016 attributed to an allegedly retroactive Administrative Support and Income Withholding Order entered in 1986 for a program that provides assistance for needy families under 89 Ill. Admin Code Section 112.1.

14. A hearing was conducted were a final administrative decision was issued against Plaintiff. Plaintiff filed a complaint in the Circuit Court of Cook County and is currently on appeal.

15. Plaintiff further alleges Count I. breach of statutory duty to follow eligibility requirement policy, failing to treat persons equally who meet the guidelines. Count II. Fraudulent concealment, omitted or concealed other relevant records of Plaintiff's parental and custodial status, wrongly classifying Plaintiff an absent non-custodial parent in addition to blindly and unreasonably applying income guidelines. Count III. Abuse of process, the filings of misrepresentations into court records three years after a law was repealed and that that filing contradicts the original order thus illegally modifying the original order. Count IV. Unjust Enrichment, Defendant by and through legal procedures used misrepresentations, lien filings, to intercept Plaintiff's funds from tax returns and bank accounts amounting over \$10,000. Count V. interference with an economic advantage, Defendant concealed Plaintiff's Parental status before

obtaining, a legal separation, dissolution of marriage or a signed Title IV-D application five years after the fact then knowingly by fraudulent concealment retroactively applying the Title IV-D enforcement services setting the stage and conditions to violate Plaintiff's rights in the future, by claiming jurisdiction retroactively, this was done by sending correspondence to make it appear that proper procedures had been followed while issuing unreasonable sanctions prohibiting the renewal of Plaintiff's passport, therefore restricting his business travel that required Plaintiff to appear in person to sign business and financing contracts therefore causing over \$75,000 in business losses and opportunities.

WHEREFORE, plaintiff seek the following relief:

- A. Damages to compensate for loss of business opportunities, restitution for monies taken, pain and suffering inflicted by defendant;
- B. Punitive damages from blind and unreasonable sanctions, unequal treatment; and
- C. Injunctive, declaratory relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. §§ 1988.

Plaintiff's signature: /s/ Ibrahim Mustafaa

Plaintiff name: Ibrahim Mustafaa

Plaintiff's mailing address: 626 Price Ave.

City: Durham State North Carolina ZIP 27701

Plaintiff's telephone number: (601) 434-6577

Plaintiff's email address: ibrahim.mustafaa@gmail.com

16. Plaintiff's previously filed case is pending in the Illinois Appellate court 1st Judicial District under case # 1-19-0744.

Respectfully submitted,

/s/ Ibrahim Mustafaa
Pro se Plaintiff Ibrahim Mustafaa

Ibrahim Mustafaa
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email: Ibrahim.mustafaa@gmail.com

CERTIFICATE OF SERVICE

The undersigned, pro se complainant, certifies that a copy of the foregoing **Plaintiff's Complaint** will be served upon the following, or an agent thereof, via personal delivery by an individual over the age of 18 who is not a party to this action, and that a notice certifying the same will be filed upon service.

Ibrahim Mustafaa
626 Price Ave.
Durham, North Carolina 27701

/s/ Ibrahim Mustafaa
Ibrahim Mustafaa